

**Before the
Federal Communications Commission
Washington DC**

In the Matter of:)	
)	
Amendment of Part 74 of the Commission's)	
Rules to Permit Satellite Feeds to)	RM-10609
Noncommercial Educational FM Translators)	
Operating on Commercial Frequencies)	

MOTION TO ACCEPT LATE FILED COMMENTS

REC Networks is filing a motion to accept the following comments in response to comments made by Association for Community Education, Inc. Even though their comments were timely filed with the Commission, their comments did not appear in the Electronic Comments Filing System (ECFS) until January 17, 2003. REC feels that the public interest dictates a full and complete record and we hope that these comments be included in the record as the Commission considers rulemaking in the above captioned proceeding.

Respectfully submitted,

/s/ _____
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1/18/2003

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**ADDITIONAL COMMENTS IN REPLY TO
ASSOCIATION FOR COMMUNITY EDUCATION, INC.**

REC Networks LPFM Project ("REC") is a not for profit entity engaged in advocacy and data services to stations, applicants and potential applicants in the Low Power FM (LPFM) Service. REC has been very involved in following proceedings that could impact the state of the LPFM Service. These comments are a reply to the December 20, 2002 comments filed by Association for Community Education, Inc. (ACE).

ACE is a non-commercial broadcaster who has a Class B station, KMRO, Camarillo, CA and several translators in California. In their comments, ACE expresses concern about interference they are receiving from foreign FM stations which is hampering the use of a terrestrial-fed translator.

ACE demonstrates why REC's criteria for satellite-fed translators will still provide a quality radio service while maintaining a degree of localism.

REC feels that the stations operated by ACE is a good example of why our proposal to allow satellite-fed translators within the same state as the primary station as well as out of state but within 400 km of the primary station.

Compared to the "fixed distance" and "30 dBu" proposals by National Public Radio (NPR) and the 200 km radius proposed by the Amherst Alliance, REC's and NPR's criteria of satellite-fed translators being in the same state as the primary station would allow a regional broadcaster such as ACE to be able to resolve their interference problems and still maintain a

level of localism. REC feels that a broadcast station in Camarillo (Ventura County) can still serve the needs of Indio (Riverside County) in a statewide or national emergency vs. a station in Idaho meeting the Emergency Alert System (EAS) needs of listeners in Florida.

If the Commission wishes to permit satellite-fed translators in the non-reserved band, REC continues to support a plan that limits the use of satellite translators to cases where the primary station and the translator are in the same state or in a different state but within 400 km of the primary station.

/s/

Rich Eyre for

REC Networks

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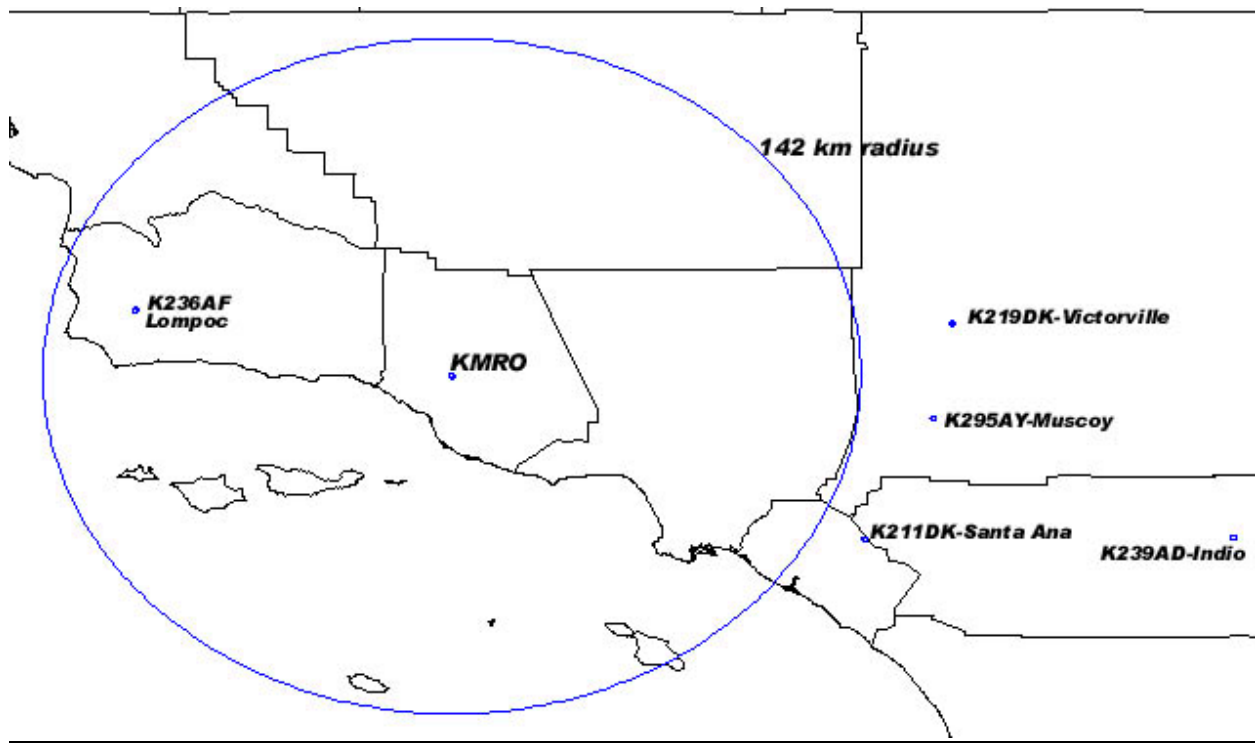
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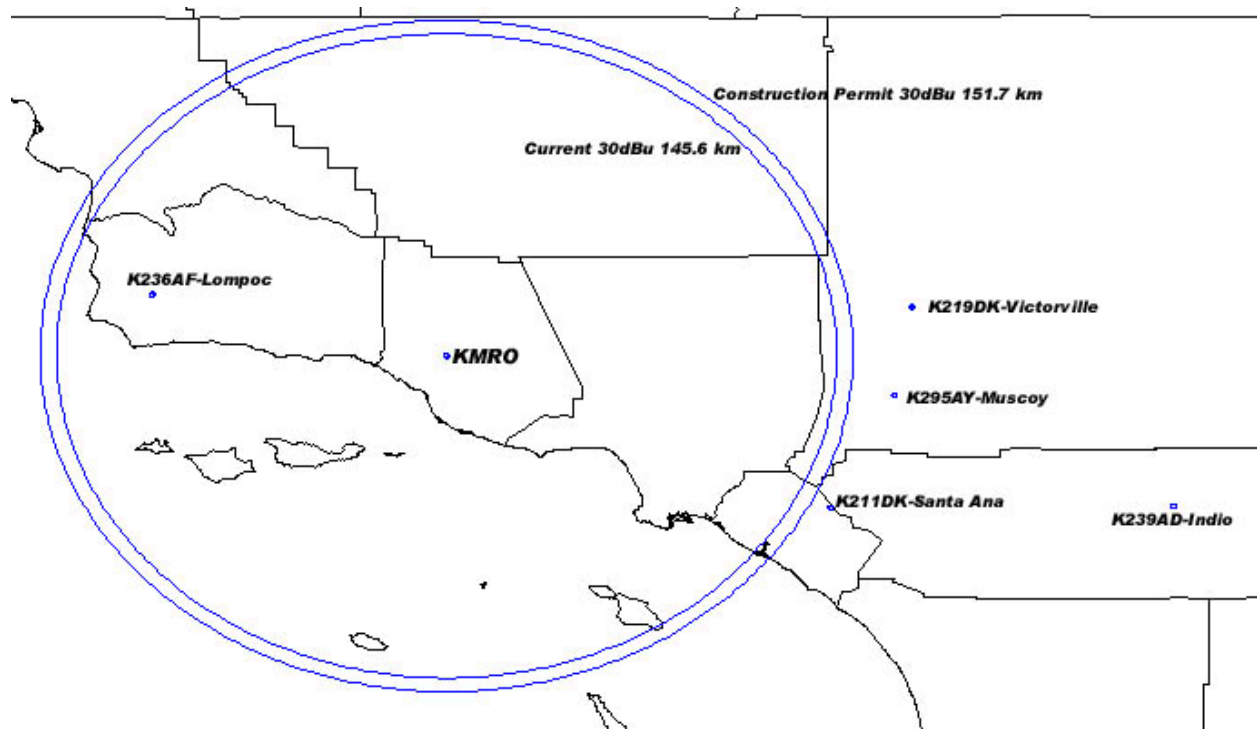
<http://www.recnet.com>

01/18/2003

APPENDIX A - KMRO AND THEIR TRANSLATORS
USING NPR'S "FIXED DISTANCE" CRITERIA



APPENDIX B - KMRO AND THEIR TRANSLATORS
USING NPR'S "30 dBu CONTOUR" CRITERIA



APPENDIX C - KMRO AND THEIR TRANSLATORS
USING AMHERST'S 200 km CRITERIA

